

RF Exposure Policies FCC 19-126

TCB Workshop
October 2020

Office of Engineering and Technology Federal Communications Commission



Outline

- FCC 19-126 rulemaking
 - Effective date
 - Rule changes
 - Exemption
 - Evaluation
 - Mitigation
 - Proposed rules
 - Other actions



FCC 19-126 Rulemaking

- Second Report and Order of FCC 19-126 includes changes to the RF exposure rules
 - Appeared April 1, 2020 in the Federal Register (FR) with correction, delay of effective date published in FR on June 2, 2020
 - Follows from proposals in FCC 13-39 (docket no. 03-137)
 - Changes to RF exposure rules in 47 CFR 1.1307, 1.1310, 2.1091, 2.1093
 - Conforming edits to 47 CFR 1.4000, 2.1033, and Parts 15, 18, 22, 24, 25, 27, 73, 90, 95, 97, 101

FCC 19-126; Proposed Changes in the Commission's Rules Regarding Human Exposure to Radiofrequency Electromagnetic Fields; docket no. 03-137 (Terminated); Adopted: November 27, 2019; Released: December 4, 2019

85 FR 18131-18151; (https://www.govinfo.gov/content/pkg/FR-2020-04-01/pdf/2020-02745.pdf) 85 FR 33578; (https://www.govinfo.gov/content/pkg/FR-2020-06-02/pdf/2020-11969.pdf)

34 FCC Rcd 11687-11855; (https://docs.fcc.gov/public/attachments/FCC-19-126A1_Rcd.pdf)



Effective Dates

- Changes to 47 CFR 1.1310 went into effect April 1, 2020
 - Removes certain limitations on permitted computational methods
- Changes to 47 CFR 1.1307, 2.1091, and 2.1093 are not yet effective
 - The process has started to establish an effective date
 - These rules may become effective prior to the next TCB Workshop



Compliance Overview

COMPLIANT

Low Power and/or Large Distance

Exemption

Simple calculation to establish whether further compliance determination is necessary.

Increasing Exposure

Evaluation

Determination of potential exposure levels to ensure compliance by calculation, measurement, or computational modeling.

NOTICE CAUTION

High Power and/or Small Distance

Mitigation

Post-evaluation procedures to ensure that the exposure limits are not exceeded



New Exemption Criteria

- 1-mW blanket exemption
 - Independent of separation distance and frequency
- SAR-based exemption formulas
 - Separation distances from 0.5 cm to 40 cm
 - Frequencies from 300 MHz to 6 GHz
- MPE-based exemption formulas
 - Separation distance at least $\lambda/2\pi$
 - Examples:
 2 m at 24 MHz; 20 cm at 240 MHz; 2 cm at 2.4 GHz
 - Frequencies from 300 kHz to 100 GHz



SAR-Based Exemption (1)

- ullet Exempt if the greater of available maximum time-averaged power or ERP does not exceed P_{th}
- Formulas to be published in amended 47 CFR 1.1307, 2.1091 and 2.1093

$$P_{th}(\text{mW}) = \begin{cases} ERP_{20\text{cm}} (d/20 \text{ cm})^{x} & 0.5 \text{ cm} \le d \le 20 \text{ cm} \\ ERP_{20\text{cm}} & 20 \text{ cm} < d \le 40 \text{ cm} \end{cases}$$

$$x = -\log_{10} \left(\frac{60}{ERP_{20\text{cm}} \sqrt{f}} \right)$$

$$ERP_{20cm}(mW) = \begin{cases} 2040f & 0.3 \text{ GHz} \le f \le 1.5 \text{ GHz} \\ 3060 & 1.5 \text{ GHz} < f \le 6.0 \text{ GHz} \end{cases}$$

d =separation distance (cm)

SAR-Based Exemption (2)

Comparison of example exemption threshold power P_{th} levels (mW) for portable devices at distances \leq 50 mm calculated per KDB Pub. 447498 D01 v06 / per amended 1.1307(b)(3)(i)(B)

| MHz | mm | 5 | 10 | 15 | 20 | 25 | 50 |
|------|----|---------------|----------------------|----------------|----------------|-----------|------------------|
| 300 | | 27 / 39 | 55 / 65 | 82 / 88 | 110 / 110 | 137 / 129 | 274 / 217 |
| 450 | | 22 / 22 | 45 / 44 | 67 / 67 | 89 / 89 | 112 / 112 | 224 / 226 |
| 835 | | 16 / 9 | 33 / <mark>25</mark> | 49 / 44 | 66 / 66 | 82 / 90 | 164 / 240 |
| 90 | 0 | 16/8 | 32 / 23 | 47 / 42 | 63 / 63 | 79 / 88 | 158 / 242 |
| 1500 | | 12 / 4 | 24 / 14 | 37 / 29 | 49 / 49 | 61 / 73 | 122 / 254 |
| 190 | 00 | 11/3 | 22 / 12 | 33 / 26 | 44 / 44 | 54 / 66 | 109 / 236 |
| 245 | 50 | 10/3 | 19 / 10 | 29 / 22 | 38 / 38 | 48 / 59 | 96 / 219 |
| 3600 | | 8/2 | 16/8 | 24 / 18 | 32 / 32 | 40 / 49 | 79 / 195 |
| 520 | 00 | 7/2 | 13 / 6 | 20 / 15 | 26 / 26 | 33 / 42 | 66 / 175 |
| 5400 | | 6/1 | 13 / 6 | 19 / 14 | 26 / 26 | 32 / 41 | 65 / 173 |
| 5800 | | 6/1 | 12/6 | 19 / 14 | 25 / 25 | 31 / 40 | 62 / 169 |



MPE-Based Exemption

- Exempt if ERP does not exceed the specified threshold
- Separation distance (R) must be at least $\lambda/2\pi$
- Formulas to be published in amended 47 CFR 1.1307
- Aligns with existing MPE limits under conservative exposure assumptions

| Transmitter Frequency (MHz) | Threshold ERP (W) |
|--------------------------------|--------------------------------------|
| 0.3 – 1.34 | 1,920 R ² |
| 1.34 – 30 | 3,450 R ² /f ² |
| 30 – 300 | 3.83 R ² |
| 300 – 1,500 | 0.0128 R ² f |
| 1,500 – 100,000 | 19.2 R ² |



Changes to Evaluation

- Numerical computation of SAR
 - Allow use of any valid computational method
 - Must be supported by adequate documentation showing full validation, and performed according to FCC-accepted standards or procedures (47 CFR 1.1310(d)(1))
- Remove the 5 cm minimum evaluation distance for frequencies above 6 GHz (47 CFR 2.1093)



Changes to Mitigation

- Establish more specific mitigation measures for transmitter sites where RF exposure limits may be exceeded
 - Access control, signage, and training requirements
 - To be published in amended 47 CFR 1.1307(b)(4)
- Primarily applicable to fixed transmitters



FCC 19-126 Proposed Rules

- Notice of Proposed Rulemaking of FCC 19-126 appeared Apr. 6, 2020 in the Federal Register
 - Extension of exposure limits below 100 kHz and above 100 GHz
 - Localized exposure limits above 6 GHz
 - Device-based time-averaging for exposure compliance
 - Wireless power transfer devices
- Proposed rules align with existing RF exposure framework
- Comment and reply comments have been collected and are under review

FCC 19-126; Targeted Changes to the Commission's Rules Regarding Human Exposure to Radiofrequency Electromagnetic Fields; docket no. 19-226; Adopted: November 27, 2019; Released: December 4, 2019

85 FR 19117-19126; (https://www.federalregister.gov/documents/2020/04/06/2020-06966/human-exposure-to-radiofrequency-electromagnetic-fields)

85 FR 35405-35406; (https://www.federalregister.gov/documents/2020/06/10/2020-12417/human-exposure-to-radiofrequency-electromagnetic-fields-reopening-of-comment-period)

34 FCC Rcd 11687-11855; (https://docs.fcc.gov/public/attachments/FCC-19-126A1_Rcd.pdf)



FCC 19-126 Other Actions

- The FCC 19-126 item includes two other FCC actions:
 - Resolution of Notice of Inquiry; docket no. 13-84
 - Continues existing:
 - SAR and MPE limits, including as pertaining to children
 - SAR evaluation basic procedures, including test separation distance requirements
 - RF exposure information dissemination processes
 - Memorandum Opinion and Order; docket no. 03-137
 - Dismiss petition-for-reconsideration (DOC-322492; Public Notice Report No. 2988; 78 FR 52893; Aug. 27, 2013) thus affirm prior decision that pinnae (outer ears) are subject to extremity SAR limits
 - Both actions are included in the Apr. 1, 2020
 Federal Register summary of FCC 19-126



Questions?